

From: [Tidmore, Guy](#)
To: [Moore, Gary](#)
Subject: RE: CES: Tanks
Date: Thursday, April 23, 2015 12:49:04 PM

Gary,

I don't recall that we had findings that the used oil ASTs had hazardous waste in them. Let me check with NEIC, who did the analytical.

From: Moore, Gary
Sent: Wednesday, April 22, 2015 11:15 AM
To: Tidmore, Guy
Subject: CES: Tanks

Guy:

We had a meeting with TCEQ and Lonestar Ecology this morning about the used oil tanks at the facility. At this point it does not look promising that things are going to happen very quickly. The comment was that if these tanks were considered Hazardous Waste Management Units (HWMU) then they would have to be closed before they could be transferred to and put back into use at a new facility (ie. Lonestar). In order to do this, my understanding is that they tanks would have to be hydroblasted and wipe tested for closure purposes. I am not sure that these are HWMUs as I don't have a copy of the permit.

We may have to wait until the PRP Group begins and then they can worry about the closure issues. I would sure like to get them off-site but don't have the funding to do this detailed of a cleaning when they are going to be put back into similar use.

This my end up being a problem. Do you have any suggestions?

I am working with Jason Ybarra, TCEQ-Houston @ 713-767-3615

Thanks

Gary Moore
Federal On-Scene Coordinator
U.S. EPA Region 6
214-789-1627 cell
214-665-6609 office
moore.gary@epa.gov